

Good cause exists to file the entirety or portions of each of these exhibits under seal. The remaining redactions relate to confidential facts and testimony regarding Google's purported confidential business information, including technical details about its products and purportedly sensitive financial information about Google's business units and organization. The sealed deposition transcripts similarly reflect Google employees' testimony about that purportedly sensitive and confidential information. Google contends that the disclosure of this information to

a non-party would create a substantial risk of serious harm to Google, including by providing its competitors an unfair advantage or unfairly allowing its competitors to develop competing products. The substantial risk cannot be avoided by less restrictive means than filing under seal.

Plaintiff has filed redacted versions of the Memorandum and the exhibits on the public docket.

Accordingly, Plaintiff respectfully requests that the Court grant this motion for leave to file his Memorandum of Law in Support of Motion to Compel Discovery and for Sanctions; and Exhibits 1-C, 1-D, 1-E, 1-F, 1-H, 1-J, 1-K, 1-L, 1-M and 1-N to the Declaration of Aaron W. Davis under seal and in redacted form on the public docket.

Dated: July 17, 2025

Respectfully Submitted:

/s/ Aaron W. Davis
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Attorneys for Plaintiff, Sholem Weisner

CERTIFICATE OF SERVICE:

This will certify that a true and accurate copy of the foregoing was filed and served electronically on all counsel of record via the Court's CM/ECF system, on this 17th day of July, 2025.

/s/ Aaron W. Davis
Attorney for Plaintiff, Sholem Weisner